## **POLSINELLI**

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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,	Chapter 11
Debtors.	Jointly Administered

CERTIFICATE OF NO OBJECTION TO MOTION OF RESCAP BORROWER CLAIMS TRUST FOR ORDER AUTHORIZING TERMINATION OF SPECIAL RESERVE FUND, FINAL DISTRIBUTION TO GMACM BORROWER TRUST CLAIMANTS, SECOND DISTRIBUTION TO RFC BORROWER TRUST CLAIMANTS, AND OTHER RELATED RELIEF

The ResCap Borrower Claims Trust ("Borrower Trust"), as successor to the debtors and debtors-in-possession in the above-captioned cases, hereby submits this *Certificate of No Objection to Motion of ResCap Borrower Claims Trust for Order Authorizing Termination of Special Reserve Fund, Final Distribution to GMACM Borrower Trust Claimants, Second Distribution to RFC Borrower Trust Claimants, and Other Related Relief* (the "Certificate"), pursuant to Local Bankruptcy Rule 9075-2, and respectfully states:

1. On September 18, 2018, the Motion of ResCap Borrower Claims Trust for Order Authorizing Termination of Special Reserve Fund, Final Distribution to GMACM Borrower Trust Claimants, Second Distribution to RFC Borrower Trust Claimants, and Other Related Relief (the "Motion") was filed (Doc No. 10565).

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2. The deadline for filing and objection or response to the Motion expired on

October 9, 2018 (the "**Objection Deadline**").

3. Pursuant to the Order dated May 23, 2012, establishing notice, case management

and administrative procedures (Docket No. 141), notice of the Motion was provided by First-

Class United States mail or electronic mail on September 24, 2018 and September 25, 2018, to

the parties and claimants listed on Exhibits A and B to the Affidavit of Service filed on

September 26, 2018 (Doc No. 10571).

4. The Objection Deadline has now passed and counsel has reviewed the case docket

not less than forty-eight (48) hours after expiration of the Objection Deadline, and is not aware

of any objection, responsive pleading, or request for hearing with respect to the Motion that have

been filed with the clerk or served on counsel for the Borrowers Trust.

5. The Borrowers Trust respectfully requests that the Court enter an order granting

the Motion without further pleading or a hearing. A copy of the proposed Order that was

attached to the Motion, modified to reflect that no Objections have been filed and, therefore, that

no Hearing on the Motion was required, is submitted with this Certificate.

Dated: New York, New York

October 11, 2018

/s/ Daniel J. Flanigan

Daniel J. Flanigan

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